

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-388-E

IN RE:	Denmark Solar, LLC; Trask East Solar, LLC;)	
	Yemassee Solar, LLC; and Blackville Solar)	
	Farm, LLC)	
)	
	Petitioners,)	ANSWER TO AMENDED PETITION
)	
	Dominion Energy South Carolina,)	
	Inc.,)	
)	
	Respondent.)	

Pursuant to S.C. Code Ann. Regs. §§ 103-826, 103-828, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina (“Commission”), Dominion Energy South Carolina, Inc. (formerly South Carolina Electric & Gas Company) (“DESC”) hereby answers the Amended Petition filed by Blackville Solar Farm, LLC (“Blackville”), Denmark Solar, LLC (“Denmark”), Trask East Solar, LLC (“Trask East”), and Yemassee Solar, LLC (“Yemassee”), on January 23, 2020, in the above-referenced docket (the “Amended Petition”).¹ Blackville, Denmark, Trask East, and Yemassee (collectively, the “Petitioners”) filed the original Petition on December 19, 2019 (the “Original Petition”), and DESC filed its Answer to the same on January 21, 2020 (the “Original Answer”).

RESPONSE TO ALLEGATIONS OF AMENDED PETITION

Although the Amended Petition contains certain clarifications, it does not introduce new substantive issues for this Commission to address. As such, DESC hereby incorporates by reference the Original Answer as if it were repeated verbatim herein.

¹ To the extent any material allegation of the Amended Petition requires a specific admission or denial, and the same is not addressed herein, such allegation is specifically denied. DESC stipulates that the power purchase agreements in dispute speak for themselves, and DESC has no knowledge of Petitioners’ inability to obtain financing or whether such financing could be completed in accordance with Petitioners’ requested relief.

Specifically, the Original Answer presented this Commission with arguments and supporting facts detailing, among other things:

- Petitioners’ failure to provide this Commission with an appropriate basis for relief;
- The complete absence of any “public interest” that would justify this Commission granting Petitioners’ requested relief—a standard imposed upon this Commission by the South Carolina General Assembly in S.C. Code § 58-27-980; and
- Language in (i) Petitioners’ power purchase agreements and (ii) South Carolina law that—in each case—prohibits Petitioners’ requested relief.

CONCLUSION

For the reasons stated above and in the Original Answer—which is incorporated herein by reference—the relief requested in the Amended Petition should be denied.

[SIGNATURE PAGE FOLLOWS]

Respectfully Submitted,

/s/ J. Ashley Cooper

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Cayce, South Carolina
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